

# START

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## MEETING MINUTES

## PROJECT MANAGERS MEETING

## HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

AUGUST 8-9, 1989

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From/Approval: *R. D. Freeberg* Date: 8/22/89  
R. D. Freeberg, DOE Project Manager

Approval: *R. F. Stanley* Date: 8/18/89  
R. F. Stanley, Ecology Project Manager

Approval: *Paul T. Day* Date: 8/18/89  
P. T. Day, EPA Project Manager

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The initial Project Manager's meeting in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) was held on August 8, 9 in Richland, Washington. Attachment 1 provides the agenda for the meeting. The following summarizes the discussions and results of the meeting, and identifies the resultant action items:

August 8, 1989

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## Attendees:

Roger F. Stanley - Ecology  
Paul T. Day - EPA  
Roger D. Freeberg - DOE  
Jack L. Waite - WHC



## 1. Feedback On Draft Quarterly Progress Report

EPA and Ecology provided informal comments on the draft report which was previously provided to them. It was recognized that some of the general comments and recommendations would be factored into subsequent reports. Some of the significant comments are as follows:

- Include less general discussion and background, and provide more specific details as to technical accomplishments. See Tank Farm monthly surveillance report as an example.
- Reorganize to minimize redundancy, primarily between the introduction, highlights and progress sections.
- Provide specific dates (or time periods) for upcoming actions.
- Explain and highlight the status line on the work schedule.

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## 2. Work Schedule Status Review

The work schedule was reviewed as part of the Quarterly Progress Report review. All parties agreed that we should try and improve the display of the work schedule and how it is statused as part of the next annual update. The fact that some intermediate target dates have been or will be missed was discussed. Most of these dates were incorrectly listed on the work schedules whey they were printed. Consequently, the parties agreed they need to be corrected on the annual update. No interim or major milestones are affected. The statused work schedule will be issued as part of the Quarterly Progress Report on August 15.

## 3. Status of Tri-Party Agreement Procedures

Five draft procedures were distributed to EPA and Ecology for review:

- Unit Managers List
- Maintenance of Action Plan Appendices B, C and D
- Quarterly Progress Reports
- Change Control
- Notice to Agencies of Field Activities

DOE will provide a list of all procedures anticipated for EPA and Ecology review.

## 4. Pending Change Packages

Attachment 2 provides a change package switching 241-TX-302B catch tank from 200-TP-5 to 200-TP-2 operable unit which was approved at the meeting. A change package to delete milestone M-17-07 is being developed, and will be provided to EPA and Ecology for review and approval.

## 5. Location of Agency Personnel

Ecology summarized their progress on locating an office in the Tri-Cities. They are trying to rent space by October which is highly optimistic within their system. November may be more realistic. The plan is to staff 5-7 people in the Tri-Cities by the end of 1990, which will include an office manager and secretary.

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#### 6. Administrative Record File

Administrative Records have only been established for the five operable units which have had work plans submitted. No records have been established for TSD groups. Ecology agrees they should note AR file on distribution for all correspondence and documents which need to go in the record. It is also recognized that training is needed for all parties on the AR file and what goes into it. DOE will establish a training program.

#### 7. Potential Modifications To The Action Plan

In addition to the planned annual update to the Action Plan, which only addresses appendices B through E of the Action Plan, the parties discussed the potential for having to modify the Action Plan itself, or possibly even the legal portion of the Agreement. Each party agreed to maintain a list of potential areas of change to discuss at the next Project Manager meeting. At that time, the parties will decide if a modification is necessary and when. It was agreed that the emphasis should be on correcting inadvertent errors rather than on substantive modifications. The parties discussed issuing the annual update (Appendices B, C, D and E) as a supplement to the Agreement to include Appendix A.

#### 8. Approach To 1990 Annual Update To The Work Schedule

The annual update must be completed, to include public comment by the end of December in order to be in place by CY 1990. Therefore, the process must be initiated by the beginning of October, with public comment commencing at the beginning of December. DOE will establish a plan of action for the update and present it at the next Project Manager meeting.

#### 9. Unit Manager's Listing

A draft update to the July 15 Unit Manager's Listing was handed out for discussion. The agreement calls for unit managers to be assigned to Operable Units and TSD groups. Other Tri-Party Agreement Scope items are also included on the listing. In addition, the parties recognized the need to assign individuals to special topics/issues (e.g. data base development). Therefore, it was agreed to limit the Unit Manager's list to Operable Units and TSD groups, but to expand the listing under the title of "Assignment of Personnel" to include other activities, along with other Tri-Party Agreement scope. The parties also agreed that first names will be used instead of initials.

#### 10. Signature Levels

DOE will draft a procedure on signature levels for EPA and Ecology approval. The procedure will discuss who signs documents and letters and who they are transmitted to.

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#### 11. Scheduling of Unit/Project Manager Meetings

It was agreed that the next Project Manager meeting will be around October 1, 1989, primarily to kickoff the 1990 annual update process. The need to coordinate and integrate Unit Manager meetings was discussed. DOE is looking into a six months schedule of Unit Manager meetings for Operable Units. DOE will establish a central clearing-house for all Unit Manager and other special meetings.

#### 12. Impacts of Extensions of Review Times

DOE expressed concern over the impact of extending review times on their planned activities, especially when DOE starts sending a work plan every two months. DOE requested that if an extension was necessary, that the agencies notify them at least 30 days in advance of the due date to help prepare for the delay.

#### 13. Standardized Format For Comments and Responses

EPA proposed that the current format for commenting on work plans by EPA be used for all documents by EPA and Ecology. Ecology felt that their NOD process was basically the same. All parties agreed to look into providing a diskette (Word Perfect) of comments with the hard copy to assist DOE with preparation of its response.

#### 14. Listed Waste Issues

It was agreed that this topic primarily dealing with the 242-A Evaporator would be handled through separate communication and meetings.

A summary of action items from the August 8 meeting is included in Attachment 3 along with any actions from the August 9 discussions.

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August 9, 1989

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## 1. Decontamination and Decommissioning Issues

### Attendees:

Roger Stanley - Ecology  
 Paul T. Day - EPA  
 Roger Freeberg - DOE  
 William T. Dixon - WHC  
 Jack L. Waite - WHC  
 William F. Heine - WHC  
 Linda L. Powers - WHC

Bill Heine made a presentation concerning three underground tanks at the Strontium Semiworks and the potential for hazardous wastes. R. Stanley requested that DOE provide a copy of the documentation from WHC identifying the problem with the CX-72 tank. Also, DOE needs to verify if the CX-71 tank is covered as a waste unit. Ecology asked that they be kept informed on each of these three tanks.

## 2. Liquid Effluent Study Plan

### Attendees:

Roger Stanley - Ecology	✓ Rex Thompson - WHC
Toby Michelena - Ecology	✓ Donald Flyct - WHC
Larry Goldstein - Ecology	✓ Dale McKenney - WHC
Paul T. Day - EPA	✓ Donald Sommer - WHC
Roger Freeberg - DOE	✓ Jack Sonnichsen - WHC
✓ William T. Dixon - WHC	✓ Al Law - WHC
✓ Jack L. Waite - WHC	✓ Wayne Johnson - WHC
✓ Linda L. Powers - WHC	

DOE provided EPA and Ecology a set of responses to their comments on the Liquid Effluent Study Project Plan. Ecology did not accept these responses, and has no plans to review or comment. The majority of State and EPA comments are to be incorporated. The major issue dealt with the number of effluent samples to be taken and the use of data from previous samples. Ecology expects representative samples from all waste streams to be collected/analyzed as part of the study. Ecology further noted that it cannot approve the study plan until this commitment is recognized, and until DOE/WHC delete any ability to opt out of representative sampling. No agreement was reached. DOE will propose, as part of each stream specific report, a definitive sampling and analysis plan for EPA and Ecology review. Ecology requested to know how many samples are planned for the \$624K. DOE will proceed to

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#### 4. Purge/Well Development Water Status

##### Attendees:

Roger Stanley - Ecology	William T. Dixon - WHC
Toby Michelena - Ecology	Jack L. Waite - WHC
Larry Goldstein - Ecology	Dave Turner - WHC
Paul. T. Day - EPA	Rex Thompson - WHC
Roger Freeberg - DOE	Lucinda Borneman - WHC
Robert Holt - DOE	

EPA and Ecology provided feedback on the Purge Water documentation which had been provided to them. Indications were that the parties were close to an agreement. The following summarizes the discussion:

- o Ecology wants to include words to ensure their prerogative to require toxicity testing (i.e. fish bio-assay) per WAC 173-303-070(4)
- o There is still concern by Ecology whether a new basin will qualify as interim status expansion. Of specific concern of all parties, is the requirement for a Notice of Intent for submittal of an interim status expansion request per state regulations and its subsequent waiting period. Ecology will evaluate the feasibility of a waiver for this requirement.
- o A decision on how to support the RCRA Monitoring Well Program to proceed with Purge Water is required by August 16, 1989. In addition, the goal is to have an approved Purge Water agreement by August 16, 1989.

DOE stated at the end of the discussion that, even though it was proceeding with the strategy worked out with Ecology, it was doing it under protest due to the basic disagreement on whether listed constituents in Purge Water should be classified as a hazard waste. DOE's sending a letter to Ecology expressing their concerns.

##### Summary of Attachments:

1. Agenda
2. Approved Change Package
3. Action Items

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reissue the project plan based on the comments for EPA and Ecology review and approval. EPA emphasized that the primary intent of the study was to assess the input of continued liquid waste discharges; accordingly it is imperative that this portion of the study be adequately addressed and not be compromised in order to obtain additional waste stream samples.

The second part of the discussion pertained to the upcoming Waste Characterization Report due August 31, 1989. An outline of the report was presented to EPA and Ecology. It was proposed that a proposed sampling schedule not be included in the August 31 report, but that they be included in the stream specific reports. This was not acceptable to EPA and Ecology. It was finally agreed that a sampling plan will be included to the extent practicable, and would be further defined in the stream specific reports. EPA and Ecology also wanted the August 31 report to include a schedule for submittal of each stream specific report. DOE agreed to provide this.

### 3. Clarification of Sections 5.3, 6.2, and 6.3.1 of Action Plan

#### Attendees:

Roger Stanley - Ecology  
 Toby Michelena - Ecology  
 Larry Goldstein - Ecology  
 Paul T. Day - EPA  
 Roger D. Freeberg - DOE  
 Pat Turner - DOE

William T. Dixon - WHC  
 Jack L. Waite - WHC  
 Linda L. Powers - WHC  
 Carol Geier - WHC  
 Joan Woolard - WHC  
 Barry Vedder - WHC  
 Joe Thrasher - WHC

Section 5.3 -- This section imposes final status closure standards regardless of the facilities permit status. DOE expressed concern over: 1) compliance with background levels for clean closure, and 2) the need to develop contingent plans for landfill closure and post-closure as part of a closure plan which proposes clean closure. As for 2101-M pond, Ecology agreed to review the plan without the contingent plans, but that the NOD will require the contingent plans in the next submittal. In addition, Ecology will consider DOE's justification for using health based standards for 2101-M pond.

Section 6.2 -- Section 6.2 states that EPA and Ecology will issue the permit for less than the entire facility. In previous unit manager meetings, Ecology has indicated that they cannot do this and are developing a way to issue a permit which covers the whole Hanford Site. Both EPA and DOE have expressed concern over this approach and have indicated that we should proceed in accordance with the Agreement. Ecology will review this issue to include the possibility of new regulations equivalent to 40CFR270.1<sup>(4)</sup>, which will allow them to proceed in accordance with the Agreement. (C)

Section 6.3.1 -- DOE is unclear on what is meant in section 6.3.1 pertaining to WAC 173-303-645 application. DOE provided Ecology an interpretation for their review. Ecology agreed to get back with DOE on the interpretation.

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TENTATIVE AGENDA (3RD ISSUE)  
TRI-PARTY AGREEMENT PROJECT MANAGERS MEETING  
RICHLAND, WASHINGTON

August 8, 1989 - 9:00 a.m. - 4:00 p.m. (Federal Building, Rm 100A)

GENERAL DISCUSSION:

- o Feedback on Draft Quarterly Progress Report
- o Work Schedule Status Review
  - Target Date Issues
- o Status of Tri-Party Agreement Procedures
- o Pending Change Packages
- o Location of Agency Personnel
- o Administrative Record File
- o Potential Modifications to the Action Plan
- o Approach for 1990 Annual Update to Work Schedule
- o Unit Managers Listing
- o Signature Levels
- o Scheduling of Unit/Project Managers Meetings
- o Impacts of extensions of review times
- o Standardize format for comments; responses
- o Listed Waste Issues

August 9, 1989 - 7:30 a.m. - 12:00 p.m. (Tri-City Professional Center, Rm 510)

SPECIAL TOPICS:

- |   |               |
|---|---------------|
| o Decontamination & Decommissioning Issues  | 7:30 - 8:00   |
| o Liquid Effluent Study Plan  | 8:00 - 9:30   |
| o Action Plan Section 5.3, 6.2, 6.3.1 <ul style="list-style-type: none"><li>- Clarification</li></ul> | 9:30 - 10:30  |
| o Break   | 10:30 - 10:45 |
| o Purge/Well Development Water Status   | 10:45 - 12:00 |



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Change Number  C-89-1	<b>FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM</b> <small>Do not use blue ink. Type, or print using black ink.</small>	Date  8-2-89												
Originator R. B. Garth		Phone 509-376-1480												
Class of Change <input type="checkbox"/> I - Signatories (Section 13.0) <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager														
Change Title Operable Unit Change of the 241-TX-302B Waste Unit														
Description/Justification of Change <p>Change the listing of the 241-TX-302B Waste Unit from Operable Unit 200-TP-5 to Operable Unit 200-TP-2. This change will reflect the true location of the waste unit and will authorize the correction of the following:</p> <ol style="list-style-type: none"> <li>1. Hanford Federal Facility Agreement and Consent Order -- Appendix "C"</li> <li>2. Hanford Waste Management Units Report at the next update</li> <li>3. Waste Information Data System (WIDS) upon change request approval</li> <li>4. Prelim. Operable Units Designation Project at the next update</li> </ol>														
Impact of Change <p>No change in the overall Environmental Restoration work scope. Since no action has begun on either of the affected operable units, no existing work scope, schedule, or budgets are impacted.</p>														
Affected Documents <ol style="list-style-type: none"> <li>1. Hanford Federal Facility Agreement and Consent Order</li> <li>2. Hanford Waste Management Units Report (DOE/RL 88-30)</li> <li>3. Preliminary Operable Units Designation Project (WHC-EP-0216)</li> </ol>														
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">           Approvals         </td> <td style="width: 30%; text-align: center;"> <input checked="" type="checkbox"/> Approved     <input type="checkbox"/> Disapproved         </td> <td style="width: 40%;"></td> </tr> <tr> <td>           DOE <i>[Signature]</i> </td> <td style="text-align: center;"> <i>8/8/89</i>            Date         </td> <td></td> </tr> <tr> <td>           EPA <i>[Signature]</i> </td> <td style="text-align: center;"> <i>8/8/89</i>            Date         </td> <td></td> </tr> <tr> <td>           Ecology <i>[Signature]</i> </td> <td style="text-align: center;"> <i>8/8/89</i>            Date         </td> <td></td> </tr> </table>			Approvals	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved		DOE <i>[Signature]</i>	<i>8/8/89</i> Date		EPA <i>[Signature]</i>	<i>8/8/89</i> Date		Ecology <i>[Signature]</i>	<i>8/8/89</i> Date	
Approvals	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved													
DOE <i>[Signature]</i>	<i>8/8/89</i> Date													
EPA <i>[Signature]</i>	<i>8/8/89</i> Date													
Ecology <i>[Signature]</i>	<i>8/8/89</i> Date													

ACTION ITEMS  
PROJECT MANAGER MEETING  
AUGUST 8, 9, 1989

- PM-1. EPA and Ecology review the 5 Tri-Party Agreement procedures handed out at the August 8 meeting and provide comments to DOE.
- PM-2. DOE provide EPA a list of all joint procedures currently anticipated for the Agreement.
- PM-3. EPA and Ecology review the list of proposed procedures provided under item 2 and provide feedback to DOE on additional needs or those which they feel are not necessary.
- PM-4. DOE provide EPA and Ecology a change package deleting Milestone M-17-07 for their review and disposition.
- PM-5. DOE provide EPA and Ecology a copy of the latest AR file index.
- PM-6. DOE develop a schedule for Administrative Record training.
- PM-7. All parties maintain a list of potential modifications to the Tri-Party Agreement for discussion at the next Project Manager meeting.
- PM-8. DOE prepare and present a plan-of-action for the annual update to the work schedule at the next Project Managers meeting.
- PM-9. DOE modify and expand the unit managers listing to include other activities. Include first names instead of initials.
- PM-10. DOE provide EPA and Ecology a draft procedure on signature levels for their review.
- PM-11. Ecology assess the feasibility of transmitting a diskette along with their comments to assist the response effort.
- PM-12. DOE provide EPA and Ecology copies of the documentation and correspondence from WHC which address the CX-72 tank issue.
- PM-13. DOE verify if the CX-71 tank is considered part of the 216-C-1 crib, or if CX-71 needs to be added as a separate unit.
- PM-14. DOE identify the planned number of samples to be taken for the \$624K identified in the Liquid Effluent Study Project Plan.
- PM-15. DOE reissue the Liquid Effluent Study Project Plan for EPA and Ecology review and approval.
- PM-16. Ecology provide feedback on the feasibility of permitting for less than the entire facility.

- PM-17. Ecology provide feedback on DOE's clarification of section 6.3.1 of the Action Plan.
- PM-18. DOE incorporate EPA and Ecology comments on purge water strategy and agreement and resubmit to EPA and Ecology.
- PM-19. DOE provide EPA and Ecology a set of large scale well maps for the Hanford Site.

9513338.0013

## DISTRIBUTION COVERSHEET

## Author

J. L. Waite 6-2248

## Addressee

Distribution

## Correspondence No.

## Subject

PROJECT MANAGERS MEETING MINUTES (TRI-PARTY AGREEMENT)

## Internal Distribution

Approval	Date	Name	Location	w/att
		DOE:		
		R. D. Freeberg	A6-95	
		WHC:		
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		W. T. Dixon	H4-52	
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		R. E. Lerch	H4-51	
		H. E. McGuire	H4-51	
		D. E. McKenney	R2-11	
		R. D. Morrison	H4-52	
		J. E. Nolan	B3-01	
		L. L. Powers	H4-51	
		D. J. Sommer	H4-52	
		J. C. Sonnichsen	H4-50	
		R. R. Thompson	R1-10	
		D. A. Turner	R1-10	
		S. A. Wiegman	H4-50	
		R. D. Wojtasek	H4-17	
		FEDMC	H4-51	
		SP&I (DLD)	H4-52	
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